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June 26, 2023

VIA ECF

Hon. Cathy L. Waldor, U.S.M.J.
United States District Court
District of New Jersey
Martin Luther King Courthouse
50 Walnut Street
Newark, New Jersey 017102

Re: **Johnson & Johnson Health Care Systems, Inc. v. Save On SP, LLC,**
Civil Action No. 22-2632 (ES)(CLW)

Dear Judge Waldor:

This law firm in association with the law firm of Selendy Gay Elsberg, P.L.L.C., represents Defendant Save On SP, L.L.C. in the above-referenced matter. The purpose of this letter is to request an extension of the time for Save On SP to move to permanently seal certain portions of the transcript of the hearing held on June 6, 2023, before Your Honor. Counsel for Plaintiff Johnson & Johnson Health Care Services, Inc., (“JJHCS”) has kindly consented to this relief.

As Your Honor may recall, Save On SP previously moved for an Order [ECF No. 117] permanently sealing certain portions of the Joint Letters [ECF Nos. 109 and 110] (the “Motion to Seal”) that were argued on the record before the Court on June 6, 2023. JJHCS has objected to that portion of the Motion to Seal concerning the letter at ECF No. 109. [ECF. No. 119]

The colloquy with the Court on the 6th included information of the type included in the Joint Letter [ECF No. 109] that is the subject of the Motion to Seal. At the conference, Save On SP reserved and did not waive its rights regarding the confidentiality of that information, and that transcript is provisionally under seal as of this writing. Save On SP intends to move for an Order permanently sealing certain portions of the June 6 transcript as well. The due date for the anticipated motion to seal the transcript (the “Transcript Sealing Motion”) is tomorrow pursuant to the Rules of Court. The return date of the Motion to Seal is July 17, 2023, but the Court may

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Hon. Cathy Waldor, U.S.M.J.
United States District Court

June 26, 2023

Page 2

well intend to rule upon it at tomorrow's status conference. In either event, we believe that Your Honor's disposition of the Motion to Seal will inform the parties' position on the anticipated Transcript Sealing Motion, and thus streamline proceedings on that motion.

In light of the foregoing, we respectfully request that the Court adjourn the due date for the Transcript Sealing Motion until two weeks after the Motion to Seal is decided. Please find attached a proposed Order setting forth this relief.

We thank Your Honor for your kind attention to this request. Please do not hesitate to have the Court's staff contact me with any questions or if we may be of any service to the Court whatsoever.

Respectfully submitted,

/s/ *E. Evans Wohlforth, Jr.*

E. Evans Wohlforth, Jr.

(Encl.)

cc: All Counsel of Record (*via* ECF with enclosure)